

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**[PROPOSED] ORDER
GRANTING
DEFENDANTS' MOTION
TO COMPEL THE
PRODUCTION OF
TESTING AND OTHER
MATERIALS IN THE
POSSESSION OF CLASS
EXPERT, DR. RON NAJAFI**

ORDER

THIS MATTER, having been opened to the Court by Defendants for entry of an order compelling the production of testing and other materials in the possession of class expert, Dr. Ron Najafi, and the Court having considered the submissions and arguments of the parties, and for good cause shown;

IT IS on this ____ day of _____, 2022, **ORDERED** as follows:

1. Defendants' Motion to Compel is granted; and
2. It is hereby ordered that Plaintiffs shall produce, within 14 days, the following materials:

- a) The results of all testing performed by Emery Pharma and/or Valisure

on any valsartan drug substance or drug product;

- b) The standard operating procedures, protocols, methods (including validation) governing any such testing;
- c) All reports and data generated related to any such testing;
- d) The standard operating procedures, protocols, and policies related to the sourcing and chain of custody for all samples of valsartan drug substance or drug product received by Emery, including materials identifying the patient to whom the medication was prescribed, manufacturer, NDC, and batch/lot number;
- e) All correspondence to, from, and among representatives of Emery Pharma and/or Valisure regarding any testing performed on valsartan or the citizen petition submitted to FDA on June 13, 2019; and
- f) All invoices generated by Dr. Najafi and/or Emery Pharma related to this testing.

Hon. Robert B. Kugler